

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CARRIE WALKER,

Plaintiff,

VS.

**METROPOLITAN LIFE INSURANCE
COMPANY,**

Defendant.

§§ 87(2)(b), 87(4-b), 87(4-g), 87(4-h)

CIVIL ACTION NO. 4:16-CV-3474

**DEFENDANT METROPOLITAN LIFE
INSURANCE COMPANY'S DESIGNATION OF EXPERTS**

Defendant Metropolitan Life Insurance Company (“MetLife”), pursuant to the Court’s Scheduling/Docketing Control Order, designates the following as a person who may give expert testimony in this matter:

1. Linda G. Moore

Linda G. Moore received a Bachelors of Business Administration degree from Texas Tech University and her law degree from St. Mary's University School of Law. Ms. Moore is licensed to practice law in the state of Texas and has handled a wide variety of commercial and insurance litigation matters. She has represented both plaintiffs and defendants in ERISA benefit lawsuits. Ms. Moore is familiar with the reasonable and necessary attorneys' fees incurred in representing plaintiffs or defendants in cases similar to this litigation in the Southern District of Texas.

Ms. Moore is the attorney representing MetLife in this litigation and is knowledgeable of the facts and the issues in this matter. She will testify regarding the reasonableness of any request for attorneys' fees in this case, including attorneys' fees regarding any appeals of this

case. Her opinions are based, at least in part, on her experience as a trial attorney and her knowledge of the legal services provided by counsel in this matter.

At this time, Ms. Moore does not anticipate using any exhibits to support her opinions other than possibly billing statements with any privileged information removed. Ms. Moore has not published any articles relating to attorneys and attorneys' fees within the preceding ten years. She has testified in several state court matters regarding reasonable and necessary attorneys' fees. Ms. Moore has not been specifically retained to give expert testimony and except for the fees for representing MetLife in this matter, she is not being paid any additional fee for her testimony in this case.

Respectfully submitted,

/s/ Linda G. Moore

Linda G. Moore
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**ATTORNEY FOR DEFENDANT
METROPOLITAN LIFE INSURANCE
COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant's Designation of Experts was electronically filed and has been served on all counsel of record through the Court's CM/ECF system on this 13th day of June 2017, to:

Marc S. Whitehead
Marc Whitehead & Associates,
Attorneys at Law L.L.P.
5300 Memorial Drive, Suite 725
Houston, Texas 77007

/s/ Linda G. Moore
Linda G. Moore